

EXHIBIT A:

Affidavits

DRUMMOND & SQILLACE, PLLC

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Attorneys for Plaintiff MICHAEL MAY A/K/A FLOURGON

Docket No.: 18 CV 2238 (LAK)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

-----X
MICHAEL MAY a.k.a. FLOURGON, an individual,
Plaintiff,

-against-

DESTINY HOPE CYRUS a.k.a. MILEY RAY CYRUS, an individual, THERON THOMAS, an individual, TIMOTHY THOMAS, an individual, SONY CORPORATION OF AMERICA, a New York corporation, SONY MUSIC HOLDINGS, INC. f.k.a. SONY MUSIC ENTERTAINMENT, a Delaware corporation, SONY MUSIC, a Delaware corporation, RCA RECORDS, a Delaware corporation, MICHAEL LEN WILLIAMS II a.k.a. MIKE WILL MADE IT/ MIKE WILL MADE-IT/MIKE WILL, an individual, and LARRY RUDOLPH, an individual,

Defendants.

-----X
AFFIDAVIT OF CLEVELAND CONSTANTINE BROWNE

In the matter of "We Run Things"
Copyright claim

AND

In the matter of the Voluntary
Declarations Act of Jamaica

AND

In the matter of a claim brought by
Michael May, known professionally as
Flourgon

I, Cleveland Constantine Browne, of 3 Musca Ave, Smokey Vale, Kingston 19, Jamaica, West Indies, being duly sworn before James Thompson, Notary Public in the Parish of Saint Andrew, Jamaica and being duly sworn pursuant to 28 U.S.C. §1746, give the following declaration under the penalty of perjury, and state:

1. I am a musician, author and composer who, in the 1980's, formed the partnership Steely and Clevie Productions as well as the musical duo with Wycliffe Johnson professionally known as Steely and Clevie.
2. I have served five (5) years as Chairman of the Board for the Recording Industry Association of Jamaica and currently serve on the Board of Directors for the local Collective Management Organization (CMO) Jamaica Music Society.
3. I have known Michael May since in or about the year 1981 when I was first introduced to him while he performed as a disc jockey for the Sound System Rambo Mango International.
4. From in or about the year 1981, I have known of Mr. May as the creator, author and originator of the lyrical phrase "We run things. Things no run we" and that he created/authored same lyrical phrase in or about the year 1981 as a disc jockey. Mr. May used/sang/performed his original and creative lyrical phrase "We run things. Things no run we" as a disc jockey and performer/singer on/with Rambo Mango since he created the same in or about the year 1981.
5. Prior to Mr. May creating, authoring and originating the lyrical phrase "We run things. Things no run we" in or about the year 1981, I had never heard, or heard of, this phrase or lyrical phrase in conversations, in songs, or any other form before he created it.
6. In addition to performing ourselves, the partnership and musical duo of Steely and Clevie were hired to record music for many producers including the producer popularly known as "Red Man" for his "Red Man International" label. The Red Man label produced the 1988 hit authored, created and written by Michael May, also professionally known as "Flourgon", entitled "We Run Things".
7. Mr. May's lyrical phrase "We run things. Things no run we" that he created, originated and authored in or about the year 1981, was the hook of his 1988 hit song entitled "We Run Things". The lyrical phrase is repeated throughout the majority of the song.

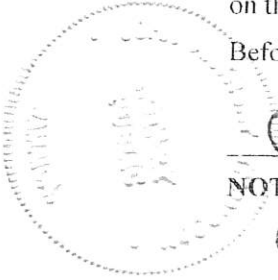
8. I make this affidavit solemnly and sincerely believing its entire content to be true.
9. I make this affidavit knowingly, voluntarily and intelligently and of my own free will. No person or entity has coerced or forced me to make this affidavit, nor do I make this affidavit under any duress, force, coercion, threats or otherwise. No person or entity has made any promises or gifts to me, nor have I received any compensation, gifts, promises or otherwise in exchange for my affidavit herein.

SWORN to by CLEVELAND CONSTANTINE BROWNE)
at 4 KINGSTON PLAZA.)
in the parish of ST. ANDREW) CLEVELAND CONSTANTINE BROWNE
on the 28th day of MARCH, 2018)

Before me JOHN ANTHONY THOMAS.

NOTARY PUBLIC

KINGSTON.
JAMAICA.



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Attorneys for Plaintiff MICHAEL MAY A/K/A FLOURGON

Docket No.: 18 CV 2238 (LAK)
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SOUTHERN DISTRICT OF NEW YORK

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MICHAEL MAY a.k.a. FLOURGON, an individual,
Plaintiff,

-against-

DESTINY HOPE CYRUS a.k.a. MILEY RAY CYRUS, an individual, THERON THOMAS, an individual, TIMOTHY THOMAS, an individual, SONY CORPORATION OF AMERICA, a New York corporation, SONY MUSIC HOLDINGS, INC. f.k.a. SONY MUSIC ENTERTAINMENT, a Delaware corporation, SONY MUSIC, a Delaware corporation, RCA RECORDS, a Delaware corporation, MICHAEL LEN WILLIAMS II a.k.a. MIKE WILL MADE IT/ MIKE WILL MADE-IT/MIKE WILL, an individual, and LARRY RUDOLPH, an individual,
Defendants.

-----X
AFFIDAVIT OF CYRIL NELSON

In the matter of "We Run Things"
Copyright claim

AND


In the matter of the Voluntary
Declarations Act of Jamaica


AND

In the matter of a claim brought by
Michael May, known professionally as
Flourgon

I, Cyril Nelson, of 60 Whitehall Avenue, Kingston 8, Jamaica, West Indies, being duly sworn before JOHN ANTHONY THOMPSON Notary Public located in the Parish of Saint Andrew, Jamaica and being duly sworn pursuant to 28 U.S.C. §1746, give the following declaration, under the penalty of perjury, and state:

1. I am a sound system operator who has owned and operated Rambo Mango International Sound System since its inception in 1980.
2. I have known Michael May since in or about the year 1981 when I employed Mr. May to work on Rambo Mango as a disc jockey.
3. From in or about the year 1981, I have known of Mr. May as the creator, author and originator of the lyrical phrase "We run things. Things no run we" and that he created/authored same lyrical phrase in or about the year 1981 as a disc jockey. Mr. May used/sang/performed his original and creative lyrical phrase/phrase "We run things. Things no run we" as a disc jockey and performer/singer on/with Rambo Mango since he created same in or about the year 1981.
4. Prior to Mr. May creating, authoring and originating the lyrical phrase "We run things. Things no run we" in or about the year 1981, I had never heard, or heard of, this phrase or lyrical phrase in conversations, in songs, or any other form before he created it.
5. I make this affidavit solemnly and sincerely believing its entire content to be true.
6. I make this affidavit knowingly, voluntarily and intelligently and of my own free will. No person or entity has coerced or forced me to make this affidavit nor do I make this affidavit under any duress, force, coercion, threats or otherwise. No person or entity has made any promises or gifts to me nor have I received any compensation, gifts, promises or otherwise in exchange for my affidavit herein.

SWORN to by CYRIL NELSON)
at 4 PARKINGTON PLAZA)
in the parish of ST. ANDREW)
on the 28th day of MARCH, 2018)
Before me JOHN ANTHONY THOMPSON)
)
NOTARY PUBLIC KINGSTON
JAMAICA


CYRIL NELSON

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Docket No.: 18 CV 2238 (LAK)
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MICHAEL MAY a.k.a. FLOURGON, an individual,
Plaintiff,

-against-

DESTINY HOPE CYRUS a.k.a. MILEY RAY CYRUS, an individual, THERON THOMAS, an individual, TIMOTHY THOMAS, an individual, SONY CORPORATION OF AMERICA, a New York corporation, SONY MUSIC HOLDINGS, INC. f.k.a. SONY MUSIC ENTERTAINMENT, a Delaware corporation, SONY MUSIC, a Delaware corporation, RCA RECORDS, a Delaware corporation, MICHAEL LEN WILLIAMS II a.k.a. MIKE WILL MADE IT/ MIKE WILL MADE-IT/MIKE WILL, an individual, and LARRY RUDOLPH, an individual,
Defendants.

-----X
AFFIDAVIT OF JUNOR BRYAN

In the matter of "We Run Things"
Copyright claim

AND

In the matter of the Voluntary
Declarations Act of Jamaica

AND

In the matter of a claim brought by
Michael May, known professionally as
Flourgon

I, Junor Bryan, professionally known as Daddy Lizard, of 12 Park Lane, Kingston 19, Jamaica, West Indies, being duly sworn before JOHN ANTHONY THOMPSON Notary Public located in the Parish of Saint Andrew, Jamaica and being duly sworn pursuant to 28 U.S.C. §1746, give the following declaration, under the penalty of perjury, and state:

1. I am a singer and disc jockey who has worked with Rambo Mango International Sound System since its inception in 1980.
2. I have known Michael May since in or about the year 1981 when Mr. May started working on/with Rambo Mango as a disc jockey.
3. From in or about the year 1981, I have known of Mr. May as the creator, author and originator of the lyrical phrase "We run things. Things no run we" and that he created/authored same lyrical phrase in or about the year 1981 as a disc jockey. Mr. May used/sang/performed his original and creative lyrical phrase "We run things. Things no run we" as a disc jockey and performer/singer on/with Rambo Mango since he created the same in or about the year 1981.
4. Prior to Mr. May creating, authoring and originating the lyrical phrase "We run things. Things no run we" in or about the year 1981, I had never heard or heard of this phrase or lyrical phrase in conversations, in songs, or any other form before he created it.
5. I make this affidavit solemnly and sincerely believing its entire content to be true.
6. I make this affidavit knowingly, voluntarily and intelligently and of my own free will. No person or entity has coerced or forced me to make this affidavit nor do I make this affidavit under any duress, force, coercion, threats or otherwise. No person or entity has made any promises or gifts to me nor have I received any compensation, gifts, promises or otherwise in exchange for my affidavit herein.

SWORN to by JUNOR BRYAN,

at 4 PARKINGTON PLAZA;

in the parish of ST. ANDREW

on the 28th day of MARCH 2018

Before me JOHN ANTHONY THOMPSON

NOTARY PUBLIC

KINGSTON
JAMAICA

J. BRYAN

JUNOR BRYAN

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Attorneys for Plaintiff MICHAEL MAY A/K/A FLOURGON

Docket No.: 18 CV 2238 (LAK)
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL MAY a.k.a. FLOURGON, an individual,
Plaintiff,

-against-

DESTINY HOPE CYRUS a.k.a. MILEY RAY CYRUS, an individual, THERON THOMAS, an individual, TIMOTHY THOMAS, an individual, SONY CORPORATION OF AMERICA, a New York corporation, SONY MUSIC HOLDINGS, INC. f.k.a. SONY MUSIC ENTERTAINMENT, a Delaware corporation, SONY MUSIC, a Delaware corporation, RCA RECORDS, a Delaware corporation, MICHAEL LEN WILLIAMS II a.k.a. MIKE WILL MADE IT/ MIKE WILL MADE-IT/MIKE WILL, an individual, and LARRY RUDOLPH, an individual,
Defendants.

-----X
AFFIDAVIT OF NIGEL LLOYD

In the matter of "We Run Things"
Copyright claim

AND

In the matter of the Voluntary
Declarations Act of Jamaica

AND

In the matter of a claim brought by
Michael May, known professionally as
Flourgon

I, Nigel Lloyd, of 34 Whitehall Avenue, Kingston 8, Jamaica, West Indies, being duly sworn before JOHN ANTHONY THOMPSON, Notary Public in the Parish of Saint Andrew, Jamaica and being duly sworn pursuant to 28 U.S.C. §1746, give the following declaration, under the penalty of perjury, and state:

1. I am a technician and electrician who has worked with Rambo Mango International Sound System since its inception in 1980.
2. I have known Michael May since 1981 when I employed Mr. May to work on Rambo Mango as a disc jockey.
3. I know Mr. May as the creator, author and originator of the lyrical phrase "We run things. Things no run we" and that he created/authored same lyrical phrase in 1981 as a disc jockey. Mr. May used/sang/performed his original and creative lyrical phrase or phrase "We run things. Things no run we" as a disc jockey and performer/singer on/with Rambo Mango since he created the same in 1981.
4. Prior to Mr. May creating, authoring and originating the lyrical phrase "We run things. Things no run we" in 1981, I had never heard or heard of this lyrical phrase in conversations, in songs, or any other form before he created it.
5. I make this affidavit solemnly and sincerely believing its entire content to be true.
6. I make this affidavit knowingly, voluntarily and intelligently and of my own free will. No person or entity has coerced or forced me to make this affidavit nor do I make this affidavit under any duress, force, coercion, threats or otherwise. No person or entity has made any promises or gifts to me nor have I received any compensation, gifts, promises or otherwise in exchange for my affidavit herein.

SWORN to by NIGEL LLOYD,
at 4 PARKINGTON PLAZA,
in the parish of ST. ANDREW)
on the 28th day of MARCH, 2018)
Before me JOHN ANTHONY THOMPSON.

Nigel Lloyd
NIGEL LLOYD

[Signature])
NOTARY PUBLIC KINGSTON.
JAMAICA.